

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: STEPHEN J. REICHERT DEBORAH A. REICHERT Debtors	CHAPTER 13 CASE NO. 13:20063-sr
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**STIPULATION REGARDING DEBTORS' MOTION TO MODIFY PLAN
POST CONFIRMATION**

It is hereby STIPULATED and AGREED by and between Robert W. Scott and Robin C. Scott (the "Scotts") and Stephen J. Reichert and Deborah A. Reichert (the "Debtors") (hereinafter referred to collectively with the Scotts as the "Parties") as follows:

1. The Scotts are secured creditors of the Debtors pursuant to a Promissory Note ("Note") and Mortgage ("Mortgage") on real estate located at 2355 E. Apache Road, Lot # 1, Game Creek Ranch Subdivision, Teton County, Wyoming ("Property").
2. On February 28, 2017 this court granted relief from the automatic stay for the Scotts to pursue their state law remedies as to the Property ("Relief Order").
3. On March 13, 2017 the Debtors filed a Motion for Post-Confirmation Modification of Chapter 13 Plan, along with a proposed Fifth Amended Plan.
4. The Scotts agree this Stipulation resolves their Objection to the Fifth Amended Plan.
5. The Parties agree that the Fifth Amended Plan does not vacate the terms of the Relief Order nor is the automatic stay reinstated as to the Property once the Fifth Amended Plan is approved by the Court, and nothing in the Fifth Amended Plan or this Stipulation restrains in

any way the right of the Scotts to proceed with their state law remedies as to the Property and sale of the Property if that is what they desire upon reacquiring ownership.

6. The Parties agree the Debtors will not seek to reinstate the 11 U.S.C. § 362 Automatic Stay in any case.

7. Once the Fifth Amended Plan is approved by this Court the Debtors will not seek to reinstate the automatic stay as to the Property in this case and will not refile another bankruptcy case within one (1) year of dismissal if this case is subsequently dismissed.

8. The Parties agree that a facsimile signature shall be considered an original signature.


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Frederick L. Reigle, Trustee
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Date: _____

Approved and so Ordered this 6th day of April, 2017:



Judge Stephen Raslavich